

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS	)	
COMMISSION'S TRIENNIAL REVIEW ORDER	)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS	)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS	)	

**ALLTEL KENTUCKY, INC AND KENTUCKY ALLTEL, INC.**  
**RESPONSE TO BELL SOUTH TELECOMMUNICATIONS, INC.'s**  
**FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

ALLTEL Kentucky, Inc. and Kentucky ALLTEL, Inc. ("ALLTEL") provide the following responses to BellSouth Telecommunications, Inc.'s ("BellSouth") First Requests for Production of Documents ("RPD").

**REQUESTS FOR PRODUCTION**

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

**Response: None were identified, other than publicly available documents.**

2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Kentucky.

**Response: In accordance with the definition of "Qualifying Service" as referenced in Section 51.5 of Title 47 of the Code of Federal Regulations, ALLTEL does not provide qualifying services and as such questions pertaining**

**to, or requesting information based on, qualifying services are not applicable to ALLTEL.**

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you only provide qualifying service.

**Response: See ALLTEL's response to RPD No. 2.**

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Kentucky to whom you only provide qualifying service.

**Response: See ALLTEL's response to RPD No. 2.**

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you only provide non-qualifying service.

**Response: ALLTEL objects to this request for production insofar as the request is vague, ambiguous, overly broad, imprecise and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see response to BellSouth Interrogatory No. 29.**

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you provide both qualifying and non-qualifying service.

**Response: See ALLTEL's response to RPD No. 2.**

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Kentucky to whom you provide both qualifying and non-qualifying service.

**Response: See ALLTEL's response to RPD No. 2.**

8. Provide all documents referring or relating to the classifications used by Company to offer service to end user customers in Kentucky (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

**Response: ALLTEL objects to this request for production insofar as the request is vague, ambiguous, overly broad, imprecise and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see ALLTEL's tariffs on file with the Commission.**

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 34.

**Response: ALLTEL does not track acquisition costs for new ILEC customers therefore there are no associated documents to produce.**

10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 35.

**Response:**

**See Exhibit A.**

11. Produce all documents referring or relating to how Company determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

**Response: None**

12. Produce all documents referring or relating to the typical or average number of DS0s at which Company would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

**Response: None**

13. Produce all documents referring or relating to the cost of capital used by Company in evaluating whether to offer a qualifying service in a particular geographic market.

**Response: See ALLTEL's response to RPD No. 2.**

14. Produce all documents referring or relating to the time period used by Company in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

**Response: See ALLTEL's response to RPD No. 2.**

15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

**Response: See ALLTEL's response to RPD No. 2.**

16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

**Response: See ALLTEL's response to RPD No. 2.**

17. Produce all documents referring or relating to any complaints by Company or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

**Response: BellSouth has not performed any hotcuts for ALLTEL therefore this request is not applicable.**

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

**Response: None.**

19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

**Response: None.**

20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

**Response: None.**

21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

**Response: None.**

Respectfully submitted,

ALLTEL Kentucky, Inc  
Kentucky ALLTEL, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Responses to BellSouth's Document Requests were served on parties participating in electronic transmission by electronic mail, and that all other parties on the attached service list were notified by letter of the filing of this document, and were given an opportunity to receive a paper copy of this document by making a request to the undersigned attorney.

This 4th day of December, 2003.

Noelle M. Holladay  
Noelle M. Holladay

**Exhibit A**

	<b>ALLTEL Kentucky Inc.</b>						
	Access Lines		Disconnects		Churn		
	Bus	Res	Bus	Res	Bus	Res	
Nov-02				-	9.72%	N/A	
	5,472	22,677	532				
Dec-02					1.56%	1.36%	
	5,439	22,719	85	308			
Jan-03					1.62%	1.66%	
	5,431	22,770	88	379			
Feb-03					1.40%	1.48%	
	5,416	22,790	76	338			
Mar-03					0.78%	1.70%	
	5,415	22,788	42	387			
Apr-03					1.41%	1.88%	
	5,385	22,771	76	427			
May-03					0.96%	2.21%	
	5,390	22,664	52	502			
Jun-03					0.98%	2.03%	
	5,404	22,628	53	459			
Jul-03					3.42%	2.09%	
	5,288	22,604	181	473			
Aug-03					1.28%	2.13%	
	5,297	22,540	68	480			
Sep-03					0.99%	2.19%	
	5,448	22,548	54	493			
Oct-03					1.30%	2.14%	
	5,458	22,526	71	481			

<b>Kentucky ALLTEL</b>						
	Access Lines		Disconnects		Churn	
	Bus	Res	Bus	Res	Bus	Res
Jan-03					2.02%	3.08%
	170,021	404,174	3,428	12,444		
Feb-03					2.08%	2.68%
	169,208	403,373	3,513	10,800		
Mar-03					1.86%	3.10%
	168,416	402,755	3,137	12,479		
Apr-03					1.53%	3.14%
	168,112	401,040	2,567	12,589		
May-03					1.73%	3.55%

	168,024	397,309	2,913	14,108		
Jun-03					2.43%	3.48%
	166,251	394,568	4,038	13,741		
Jul-03					1.64%	3.61%
	166,786	392,986	2,727	14,188		
Aug-03					1.54%	3.36%
	166,364	392,172	2,564	13,186		
Sep-03					1.82%	3.29%
	173,850	391,399	3,170	12,886		
Oct-03					1.69%	3.39%
	173,384	389,348	2,926	13,196		